

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2013-55-C

In Re:)	
)	
South Carolina Telephone Coalition Petition)	
to Modify Alternative Regulation Plans Filed)	Motion of South Carolina Cable
Pursuant to S.C. Code Ann. § 58-9-576(B) to)	Television Association for
Take Into Account Recent Action by the)	Production of Certain USF Records
Federal Communications Commission)	
)	
)	

Pursuant to R. 103-829 of this Commission’s rules of Practice and Procedure, intervenor South Carolina Cable Television Association (“SCCTA”) requests an order allowing the Office of Regulatory Staff (“ORS”) to make available under a protective order certain documents submitted to the ORS in connection with the operation of the South Carolina Universal Service Fund. In support of this motion the SCCTA would show the following:

1. In this docket the members of the South Carolina Telephone Coalition (“SCTC”) seek an increase in the maximum rate that can be charged by them for basic residential service. The SCCTA has intervened and (1) endorsed the increase sought by the SCTC and (2) requested that the Commission also require adjustments to the USF as a result of the increase in the maximum rate.

2. With respect to its request that the Commission take steps to adjust the size of the Universal Service Fund the SCCTA has suggested that the necessary USF adjustment can be accomplished through the regular annual filings made by companies (the Carriers

of Last Resort or “COLRs”) receiving subsidies from the USF. That suggestion is based on the provisions of Order No. 2001-996 in Docket No. 97-239-C and the sample reports attached to that order. However no representative of the SCCTA has seen the actual annual filings by the COLRs. The reports are filed with the Office of Regulatory Staff and are filed as confidential. These documents are clearly relevant to determining how to adjust the USF and the SCCTA must have access to them in order to effectively advocate its position in this proceeding.

3. By this motion the SCCTA requests that the ORS be allowed to make the COLR annual USF filings available under an appropriate protective order. The SCCTA will agree to maintain the confidentiality of the documents while reserving the right to request, after an opportunity to review them, that all or parts of the documents be declared non-confidential.

Dated this 22nd day of March, 2013.

ROBINSON, MCFADDEN & MOORE, P.C.



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CERTIFICATE OF SERVICE

This is to certify that I, Toni C. Hawkins, a Paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below
Motion of South Carolina Cable Television Association for Production of Certain USF Records in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

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Dated at Columbia, South Carolina this 22nd day of March, 2013.



Toni C. Hawkins